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June 5, 2024

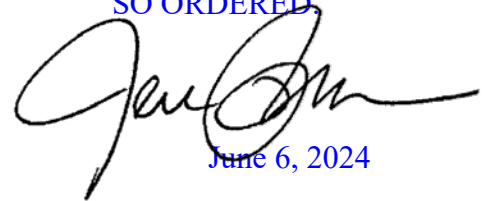
BY ECF

Hon. Jesse M. Furman
U.S. District Judge
U.S. Courthouse
40 Foley Square
New York, NY 10007

Application GRANTED. Sentencing is
hereby ADJOURNED to **July 23, 2024**,
at **10:00 a.m.** The Clerk is directed to
terminate ECF No. 255.

RE: United States v. Baker
22 CR 343 (JMF)

SO ORDERED



June 6, 2024

Dear Judge Furman:

With the consent of the government by AUSA Thomas Wright, we write to request an adjournment of the sentence in the above case. We are mindful that when the court granted our first request for an adjournment, it indicated that “no further adjournments are likely to be granted.” However, notwithstanding this statement, based on the circumstances outlined below, we make this request to adjourn the sentencing date from June 25, 2024 until July 25, 2024 as more time is needed to respond to the Pre-Sentence Report (PSR) and advocate for Mr. Baker.

Our first and only request for an adjournment of the sentence was based on lockdowns at the MDC over which we have no control. The probation officer and I went to the MDC twice to conduct the pre-sentence interview but were turned away. As of today’s date, we have not yet received the final PSR; we just received the initial PSR on May 31, 2024. As I understand it, the probation officer was late in filing the initial report because she was sick and out of the office.

Undersigned counsel needs adequate time to craft a sentencing submission on behalf of Mr. Baker, especially in light of the significant amount of time Mr. Baker faces given his age (20). In order to satisfy our obligation to effectively represent Mr. Baker at sentence, we respectfully request an adjournment of sentence until July 25, 2024, subject to court approval.

The defendant’s sentencing memo would be due July 11, 2024.

Respectfully submitted,

/s/ Louis M. Freeman
Louis M. Freeman